

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

)
In Re Terrorist Attacks on September 11, 2001) No. 03 MDL 1570 (GBD/FM)
) ECF Case

DEFENDANT Wael JEL Aidan's SUPPLEMENTAL DISCLOSURES

Defendant Wael Jelaidan ("Jelaidan"), by and through its undersigned counsel, makes the following supplemental disclosures pursuant to Federal Rules of Civil Procedure 26(a)(1). These supplemental disclosures are in addition to his September 27, 2010 initial disclosures (docket no. 2327) and are based on information reasonably available to Jelaidan as of the date hereof. The disclosures herein are provided without prejudice to the rights of Jelaidan to identify additional witnesses or evidence. Further, Jelaidan reserves the right to supplement these supplemental disclosures.

I. Individuals With Relevant Discoverable Information

The following individuals are likely to have discoverable information that Jelaidan may use to support his defenses. Jelaidan does not consent to or authorize any communications with its employees, agents, officers, or directors, whether formerly or presently associated or employed by Jelaidan and does not consent to or authorize any other communication prohibited by any applicable rule of professional conduct.

1. Name: Stiliano Ordolli, Chief
Address: Money Laundering Reporting Office
Bureau de communication

en matière de blanchiment d'argent
Office Fédéral de la Police
Bundesrain 20
3003 Berne, Switzerland
T +41 031 323 40 40
F +41 031 323 39 39
mros.info@bap.admin.ch
<https://www.admin.ch/bap>

- Subject: Has knowledge of the impact a sequestration order has on an individual's ability to access sequestered documents.
2. Name: Michael Lauber, Attorney General
Address: Office of the Attorney General
Taubenstrasse 16
CH-3003 Berne, Switzerland
T +41 58 462 45 79
F +41 58 462 45 07
Subject: Has knowledge of the impact the specific sequestration order against Jelaidan's accounts has on Jelaidan's ability to access sequestered documents.
3. Name: Sergio Mastroianni, Procureur Federal
Address: Office of the Attorney General
Taubenstrasse 16
CH-3003 Berne, Switzerland
T +41 58 462 45 79
F +41 58 462 45 07
Subject: Issued the specific sequestration order against Jelaidan's accounts.
4. Name: Federal Judicial Police
Address: Federal Office of Police (fedpol)
Nussbaumstrasse 29
CH-3003 Berne, Switzerland
T +41 58 463 11 23
F +41 58 462 53 04
Subject: Received notification of the specific sequestration order against Jelaidan's accounts.
5. Name: Citibank Geneva
Address: Quai du Général-Guisan 16
1204 Genève, Switzerland
T +41 58 750 50 00
Subject: Received the specific sequestration order against Jelaidan's account.

II. Relevant Documents

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(ii), Jelaidan provides the following description of certain documents he may use to support his defenses.

1. Various pages from the pdf file titled “05 TERROR USA JELAIDAN Bankunterlagen AKB, Citiebank, Faisal” produced by Defendant Yassin Kadi in August 2015 to the Plaintiffs on the CD titled “Terror USA partie 1 PJEF Classeurs 0-20”. Specifically, but not limited to:
 - a. Page 166: Citibank had no knowledge of unusual activity in Jelaidan’s account, believed it could not communicate with Jelaidan;
 - b. Page 35: Faisal Finance had no knowledge of unusual activity in Jelaidan’s account;
 - c. Page 224: Swiss authorities report shows no money laundering or terrorist financing activity;
 - d. Page 58-59: Blocking order on Jelaidan’s account; and
 - e. Page 210-211: Seizure and sequester order on Jelaidan’s account.

Respectfully Submitted,

MARTIN F. MCMAHON & ASSOCIATES

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